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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

YOUNG CHO,
Individually and as Representative of a Class of
Similarly Situated Persons, and on Behalf of
the PRUDENTIAL EMPLOYEE SAVINGS
401(k) PLAN,

Plaintiff,

vs.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA,
PRUDENTIAL EMPLOYEE SAVINGS
PLAN ADMINISTRATIVE
COMMITTEE, PRUDENTIAL
INVESTMENT OVERSIGHT
COMMITTEE, BELLWETHER
CONSULTING LLC, LUCIEN
ALZIARI, SARA BONESTEEL, ELLEN
BORAK, TINA CAWLEY, THOMAS
LAURITA, PATRICK LYNCH, JOSEPH
MACHEWIRTH, LYNN MCTAGGART,
GARY NEUBECK, KEVIN PRUE,
SCOTT RAMSAY, SCOTT SLEYSTER,
and SHARON TAYLOR,

Defendants.

Civil Action No. 2:19-cv-19886
(JMV)(LDW)

**[PROPOSED] STIPULATION AND
ORDER REGARDING BELLWETHER
CONSULTING LLC'S AND THE
INDIVIDUAL DEFENDANTS'
AGREEMENT TO BE BOUND BY THE
OPERATIVE DISCOVERY
CONFIDENTIALITY ORDER AND JOINT
ESI PROTOCOL**

Plaintiff, Young Cho (“Plaintiff”) and Defendants, Bellwether Consulting LLC (“Bellwether”) and Lucien Alziari, Sara Bonesteel, Ellen Borak, Tina Cawley, Thomas Laurita, Patrick Lynch, Joseph Machewirth, Lynn McTaggart, Gary Neubeck, Kevin Prue, Scott Ramsay, Scott Sleyster, and Sharon Taylor (“Individual Defendants”) by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed his initial Class Action Complaint against The Prudential Insurance Company of America, Prudential Administrative Committee, Prudential Investment Oversight Committee (“Prudential Defendants”), and Does No. 1-20, who are the previously unknown Individual Defendants, on November 5, 2019 [Dkt. No. 1];

WHEREAS, Plaintiff and Prudential Defendants negotiated and submitted a Joint ESI Protocol to govern the production of electronically stored information (“ESI”) in this action on June 8, 2020 [Dkt. No. 42-1];

WHEREAS, Plaintiff and Prudential Defendants negotiated and submitted a Discovery Confidentiality Order (“DCO”), which was entered by the Court on June 17, 2020 [Dkt. No. 45];

WHEREAS, Plaintiff filed his Amended Class Action Complaint, which added Bellwether and the since-identified Individual Defendants as defendants, on September 17, 2020 [Dkt. No. 53];

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, Bellwether and the Individual Defendants, by and through their respective undersigned counsel, that:

1. Bellwether agrees to be bound by the terms outlined in the Discovery Confidentiality Order [Dkt. No. 45] and be treated as a signatory thereto for purposes of discovery in this litigation;
2. Bellwether agrees to be bound by the terms outlined in the Joint ESI Protocol [Dkt. No. 42-1] and be treated as a signatory thereto for purposes of discovery in this litigation.
3. The Individual Defendants agree to be bound by the terms outlined in the Discovery Confidentiality Order [Dkt. No. 45] and be treated as signatories thereto for purposes of discovery in this litigation; and
4. The Individual Defendants agree to be bound by the terms outlined in the Joint ESI Protocol [Dkt. No. 45] and be treated as signatories thereto for purposes of discovery in this litigation.

Dated: February 23, 2021

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and Individual Defendants*

PROPOSED ORDER

IT IS HEREBY ORDERED that Defendant, Bellwether Consulting LLC, shall be bound by the terms of the Discovery Confidentiality Order and treated as a signatory thereto for purposes of this litigation;

IT IS FURTHER ORDERED that Defendant, Bellwether Consulting LLC, shall be bound by the terms of the Joint ESI Protocol and treated as a signatory thereto for purposes of this litigation;

IT IS FURTHER ORDERED that the Individual Defendants shall be bound by the terms of the Discovery Confidentiality Order and treated as signatories thereto for purposes of this litigation;

IT IS FURTHER ORDERED that the Individual Defendants shall be bound by the terms of the Joint ESI Protocol and treated as signatories thereto for purposes of this litigation.

SO ORDERED.

ORDERED this 26th day of February, 2021



HON. LEDA DUNN WETTRE, U.S.M.J.